

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

ILKB, LLC,

Plaintiff,

vs.

MATTHEW WHITWORTH and TRAINING
PASSION, LLC,

Defendants.

And

MATTHEW WHITWORTH and TRAINING
PASSION, LLC,

Defendant/Counter-Plaintiff,

vs.

ILKB, LLC, MICHAEL PARRELLA, and ILKB
TOO, LLC,

Counter-defendants/Additional Defendants.

Case No.: 1:20-cv-04900-WFK-LB

**DECLARATION OF DANIEL
CASTELLINI IN SUPPORT OF
COUNTER-DEFENDANTS' MOTION
TO DISMISS**

I, Daniel Castellini, declare the following is true and correct to the best of my knowledge:

1. I am over the age of 18 and competent to give testimony in this matter.
2. I am one of the managers of ILKB LLC ("ILKB"). Currently, I hold the position of CEO.
3. I make this declaration based on my personal knowledge of the operation of ILKB, and my review of the records associated with this business, I have sufficient personal knowledge to provide the sworn testimony provided below.

4. Neither I nor COO Shaun York have own an ownership/membership interest in the ILKB company.

5. ILKB remains owned, in the entirety, by Michael Parrella.

6. Mr. York and I have run ILKB since June of 2020.


7. ILKB remains the franchisor, holds the assets of the franchise, is responsible for the liabilities of the franchise, continues to operate, and is the only entity that could sue or could be sued for conduct related to ILKB's operation.

8. No assets have transferred from ILKB.

9. Currently, ILKB Too is not operating the ilovekickboxing.com business.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and based upon my personal knowledge.

Date: 06/07/2021



Daniel Castellini